

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

RABBI MARA NATHAN, on behalf of herself
and on behalf of her minor child, M.N., et al.

Plaintiffs,

vs.

ALAMO HEIGHTS INDEPENDENT
SCHOOL DISTRICT, et al.

Defendants.

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Civil Action No. 5:25-cv-00756

**DEFENDANT AUSTIN INDEPENDENT SCHOOL DISTRICT'S
ANSWER TO PLAINTIFFS' COMPLAINT**

Defendant Austin Independent School District (“Austin ISD” or the “District”) answers
Plaintiffs’ Complaint, as follows:

AFFIRMATIVE AND OTHER DEFENSES

In asserting the following defenses, Austin ISD does not admit to having the burden of proving the allegations or denials contained therein, but instead asserts that the Plaintiffs bear the burden of proving the facts relevant to many of the defenses and the burden of proving the inverse of the allegations contained in many of the defenses. Moreover, by asserting any defense, Austin ISD does not admit any liability, but, to the contrary, specifically denies any and all allegations of liability in Plaintiffs’ lawsuit. Without admitting liability as to any of Plaintiffs’ causes of action, Austin ISD asserts the following defenses:

1. The Court lacks subject-matter jurisdiction over Plaintiffs’ claims against Austin ISD because they lack standing. Plaintiffs’ alleged injuries are hypothetical and speculative, and are neither fairly traceable to—nor redressable by—Austin ISD.

2. The Court lacks subject-matter jurisdiction over Plaintiffs’ claims against Austin ISD because such claims are not ripe. Plaintiffs’ claims are contingent on future events that may not occur as anticipated, or may not occur at all.

3. Plaintiffs are not entitled to preliminary injunctive relief because they have not alleged, and cannot demonstrate, an imminent risk of irreparable harm.

4. Plaintiffs' claims are barred, in whole or in part, because Austin ISD is not a proper party to this lawsuit.

5. Plaintiffs' claims are barred, in whole or in part, because Austin ISD cannot be held liable under 42 U.S.C. § 1983 for complying with state law mandates.

ANSWER TO ALLEGATIONS

1. The allegations in Paragraph 1 contain legal conclusions that do not require a response. The remaining allegations in Paragraph 1 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them. Additionally, Senate Bill No. 10 is the best evidence of its contents.

2. The allegations in Paragraph 2 contain legal conclusions that do not require a response. The remaining allegations in Paragraph 2 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them. Additionally, the legal opinion cited is the best evidence of its contents.

3. The allegations in Paragraph 3 contain legal conclusions that do not require a response. The remaining allegations in Paragraph 3 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them. Additionally, the legal opinions cited are the best evidence of their contents.

4. The allegations in Paragraph 4 contain legal conclusions that do not require a response.

5. The allegations in Paragraph 5 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

6. Austin ISD admits that Plaintiffs seek the relief stated in Paragraph 6, but denies that it is liable to the Plaintiffs for the relief requested.

7. Austin ISD denies that the Court has subject-matter jurisdiction over Plaintiffs' claims against the District. Otherwise, the allegations in Paragraph 7 contain legal conclusions that do not require a response.

8. The allegations in Paragraph 8 contain legal conclusions that do not require a response.

9. The allegations in Paragraph 9 contain legal conclusions that do not require a response. To the extent that a response is required, Austin ISD lacks sufficient information to admit or deny the allegations in Paragraph 9.

10. The allegations in Paragraph 10 do not relate to Austin ISD and the District lacks sufficient admit or deny them.

11. The allegations in Paragraph 11 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

12. The allegations in Paragraph 12 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

13. The allegations in Paragraph 13 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

14. The allegations in Paragraph 14 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

15. The allegations in Paragraph 15 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

16. The allegations in Paragraph 16 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

17. Austin ISD currently lacks sufficient information to admit or deny the allegations in Paragraph 17.

18. The allegations in Paragraph 18 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

19. The allegations in Paragraph 19 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

20. The allegations in Paragraph 20 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

21. The allegations in Paragraph 21 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

22. The allegations in Paragraph 22 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

23. The allegations in Paragraph 23 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

24. The allegations in Paragraph 24 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

25. The allegations in Paragraph 25 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

26. The allegations in Paragraph 26 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

27. The allegations in Paragraph 27 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

28. The allegations in Paragraph 28 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

29. The allegations in Paragraph 29 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

30. Austin ISD admits the allegations in Paragraph 30.

31. The allegations in Paragraph 31 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

32. The allegations in Paragraph 32 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

33. The allegations in Paragraph 33 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

34. The allegations in Paragraph 34 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

35. The allegations in Paragraph 35 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

36. The allegations in Paragraph 36 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

37. Austin ISD admits that Texas Governor Greg Abbot signed Senate Bill No. 10 on June 20, 2025. Austin ISD admits that Senate Bill No. 10 will take effect on September 1, 2025. Otherwise, the allegations in Paragraph 37 do not relate to Austin ISD, and contain legal conclusions that do not require a response. Additionally, Senate Bill No. 10 is the best evidence of its contents.

38. The allegations in Paragraph 38 contain legal conclusions that do not require a response. Additionally, Senate Bill No. 10 is the best evidence of its contents.

39. The allegations in Paragraph 39 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

40. The allegations in Paragraph 40 contain legal conclusions that do not require a response. Additionally, Senate Bill No. 10 is the best evidence of its contents.

41. The allegations in Paragraph 41 contain legal conclusions that do not require a response. Additionally, Senate Bill No. 10 is the best evidence of its contents.

42. The allegations in Paragraph 42 contain legal conclusions that do not require a response. Additionally, Senate Bill No. 10 is the best evidence of its contents.

43. The allegations in Paragraph 43 contain legal conclusions that do not require a response. Additionally, Senate Bill No. 10 is the best evidence of its contents.

44. The allegations in Paragraph 44 contain legal conclusions that do not require a response. Additionally, Senate Bill No. 10 is the best evidence of its contents.

45. The allegations in Paragraph 45 contain legal conclusions that do not require a response. Additionally, the allegations in Paragraph 45 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them. Also, Senate Bill No. 10, and the legal opinions cited, are the best evidence of their contents.

46. The allegations in Paragraph 46 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them

47. The allegations in Paragraph 47 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

48. The allegations in Paragraph 48 contain legal conclusions that do not require a response. Additionally, the allegations in Paragraph 48 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

49. The allegations in Paragraph 49 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

50. The allegations in Paragraph 50 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

51. The allegations in Paragraph 51 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

52. The allegations in Paragraph 52 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

53. The allegations in Paragraph 53 do not relate to Austin ISD and the District lacks sufficient information admit or deny them.

54. The allegations in Paragraph 54 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

55. The allegations in Paragraph 55 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

56. The allegations in Paragraph 56 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

57. The allegations in Paragraph 57 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

58. The allegations in Paragraph 58 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

59. The allegations in Paragraph 59 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

60. The allegations in Paragraph 60 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

61. The allegations in Paragraph 61 contain legal conclusions that do not require a response.

62. The allegations in Paragraph 62 contain legal conclusions that do not require a response. Additionally, the statutes cited are the best evidence of their contents.

63. The allegations in Paragraph 63 contain legal conclusions that do not require a response. Additionally, the statutes cited are the best evidence of their contents.

64. The allegations in Paragraph 64 contain legal conclusions that do not require a response. Additionally, the statutes cited are the best evidence of their contents.

65. The allegations in Paragraph 65 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

66. The allegations in Paragraph 66 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

67. The allegations in Paragraph 67 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

68. The allegations in Paragraph 68 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

69. The allegations in Paragraph 69 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

70. The allegations in Paragraph 70 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

71. The allegations in Paragraph 71 contain legal conclusions that do not require a response. The remaining allegations in Paragraph 71 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them. Additionally, the statute cited is the best evidence of its contents.

72. The allegations in Paragraph 72 contain legal conclusions that do not require a response. Additionally, Senate Bill No. 10 is the best evidence of its contents.

73. The allegations in Paragraph 73 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

74. The allegations in Paragraph 74 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

75. The allegations in Paragraph 75 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

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79. The allegations in Paragraph 79 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

80. The allegations in Paragraph 80 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

81. The allegations in Paragraph 81 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

82. The allegations in Paragraph 82 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

83. The allegations in Paragraph 83 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

84. The allegations in Paragraph 84 contain legal conclusions that do not require a response. To the extent that a response is required, the allegations in Paragraph 84 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

85. The allegations in Paragraph 85 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

86. The allegations in Paragraph 86 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

87. The allegations in Paragraph 87 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

88. The allegations in Paragraph 88 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

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101. The allegations in Paragraph 101 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

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117. The allegations in Paragraph 117 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

118. The allegations in Paragraph 118 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

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129. The allegations in Paragraph 129 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

130. The allegations in Paragraph 130 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

131. The allegations in Paragraph 131 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

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133. The allegations in Paragraph 133 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

134. The allegations in Paragraph 134 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

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136. The allegations in Paragraph 136 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

137. The allegations in Paragraph 137 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

138. The allegations in Paragraph 138 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

139. The allegations in Paragraph 139 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

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142. The allegations in Paragraph 142 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

143. The allegations in Paragraph 143 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them

144. The allegations in Paragraph 144 do not relate to Austin ISD the District lacks sufficient information to admit or deny them.

145. The allegations in Paragraph 145 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

146. The allegations in Paragraph 146 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

147. The allegations in Paragraph 147 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

148. The allegations in Paragraph 148 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

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151. The allegations in Paragraph 151 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

152. The allegations in Paragraph 152 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

153. The allegations in Paragraph 153 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

154. The allegations in Paragraph 154 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

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158. The allegations in Paragraph 158 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

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161. The allegations in Paragraph 161 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

162. The allegations in Paragraph 162 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

163. The allegations in Paragraph 163 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

164. The allegations in Paragraph 164 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

165. The allegations in Paragraph 165 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

166. The allegations in Paragraph 166 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

167. The allegations in Paragraph 167 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

168. The allegations in Paragraph 168 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

169. The allegations in Paragraph 169 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

170. The allegations in Paragraph 170 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

171. The allegations in Paragraph 171 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

172. The allegations in Paragraph 172 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

173. The allegations in Paragraph 173 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

174. The allegations in Paragraph 174 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

175. The allegations in Paragraph 175 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

176. The allegations in Paragraph 176 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

177. The allegations in Paragraph 177 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

178. The allegations in Paragraph 178 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

179. The allegations in Paragraph 179 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

180. The allegations in Paragraph 180 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

181. The allegations in Paragraph 181 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

182. The allegations in Paragraph 182 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

183. The allegations in Paragraph 183 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

184. The allegations in Paragraph 184 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

185. The allegations in Paragraph 185 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

186. The allegations in Paragraph 186 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

187. The allegations in Paragraph 187 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

188. The allegations in Paragraph 188 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

189. The allegations in Paragraph 189 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

190. The allegations in Paragraph 190 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

191. The allegations in Paragraph 191 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

192. The allegations in Paragraph 192 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

193. The allegations in Paragraph 193 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

194. The allegations in Paragraph 194 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

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196. The allegations in Paragraph 196 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

197. The allegations in Paragraph 197 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

198. The allegations in Paragraph 198 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

199. The allegations in Paragraph 199 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

200. The allegations in Paragraph 200 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

201. The allegations in Paragraph 201 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

202. The allegations in Paragraph 202 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

203. The allegations in Paragraph 203 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

204. The allegations in Paragraph 204 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

205. The allegations in Paragraph 205 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

206. The allegations in Paragraph 206 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

207. The allegations in Paragraph 207 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

208. The allegations in Paragraph 208 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

209. The allegations in Paragraph 209 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

210. The allegations in Paragraph 210 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

211. The allegations in Paragraph 211 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

212. The allegations in Paragraph 212 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

213. The allegations in Paragraph 213 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

214. The allegations in Paragraph 214 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

215. The allegations in Paragraph 215 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

216. The allegations in Paragraph 216 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

217. The allegations in Paragraph 217 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

218. The allegations in Paragraph 218 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

219. The allegations in Paragraph 219 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

220. The allegations in Paragraph 220 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

221. The allegations in Paragraph 221 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

222. The allegations in Paragraph 222 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

223. The allegations in Paragraph 223 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

224. The allegations in Paragraph 224 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

225. The allegations in Paragraph 225 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

226. The allegations in Paragraph 226 do not relate to Austin ISD and the District lacks sufficient information to admit or deny them.

227. Austin ISD re-alleges and incorporates by reference all the above responses to Plaintiffs' allegations, as if fully set forth herein.

228. The allegations in Paragraph 228 contain legal conclusions that do not require a response.

229. The allegations in Paragraph 229 contain legal conclusions that do not require a response. Additionally, the legal opinion cited is the best evidence of its contents.

230. The allegations in Paragraph 230 contain legal conclusions that do not require a response.

231. The allegations in Paragraph 231 contain legal conclusions that do not require a response.

232. The allegations in Paragraph 232 contain legal conclusions that do not require a response. Additionally, the legal opinions cited are the best evidence of their contents.

233. The allegations in Paragraph 233 contain legal conclusions that do not require a response.

234. Austin ISD denies that it has done anything to implement Senate Bill No. 10. Otherwise, the allegations in Paragraph 234 contain legal conclusions that do not require a response.

235. The allegations in Paragraph 235 contain legal conclusions that do not require a response.

236. Austin ISD re-alleges and incorporates by reference all the above responses to Plaintiffs' allegations, as if fully set forth herein.

237. The allegations in Paragraph 237 contain legal conclusions that do not require a response.

238. The allegations in Paragraph 238 contain legal conclusions that do not require a response.

239. The allegations in Paragraph 239 contain legal conclusions that do not require a response.

240. The allegations in Paragraph 240 contain legal conclusions that do not require a response. Additionally, the legal opinion cited is the best evidence of its contents.

241. The allegations in Paragraph 241 contain legal conclusions that do not require a response. Additionally, the legal opinion cited is the best evidence of its contents.

242. The allegations in Paragraph 242 contain legal conclusions that do not require a response.

243. Austin ISD denies that it has done anything to administer or implement Senate Bill No. 10. Otherwise, the allegations in Paragraph 243 contain legal conclusions that do not require a response.

244. The allegations in Paragraph 244 contain legal conclusions that do not require a response.

Austin ISD admits that Plaintiffs seek the relief identified in the unnumbered paragraph entitled “Request for Relief,” but denies that it is liable to the Plaintiffs for any of the relief requested. Additionally, any allegations contained in unnumbered paragraphs, footnotes, or that are not explicitly admitted herein, are denied.

CONCLUSION AND PRAYER FOR RELIEF

Defendant Austin Independent School District prays that Plaintiffs take nothing on their claims and that their requests for preliminary injunctive relief be denied. Austin ISD also requests all such other and further relief to which it may be entitled, at law or in equity.

Respectfully submitted,

THOMPSON & HORTON LLP

By: /s/ Stephanie A. Hamm.
Stephanie A. Hamm
Texas Bar No. 24069841
shamm@thompsonhorton.com
3200 Southwest Freeway, Suite 2000
Houston, Texas 77027
Telephone: (713) 554-6714
Facsimile: (713) 583-9611

ATTORNEYS FOR DEFENDANT
AUSTIN INDEPENDENT SCHOOL
DISTRICT

CERTIFICATE OF SERVICE

I hereby certify that on August 7, 2025, a true and correct copy of the foregoing document was served electronically on all counsel of record, via the Court's CM/ECF filing system, or as otherwise authorized by the Federal Rules of Civil Procedure:

/s/ Stephanie A. Hamm
Stephanie A. Hamm